

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) Case No. 23 B 07565
Dennis Tucker,) Honorable Cox
Debtor) Chapter 13
)

NOTICE OF MOTION

TO: Chapter 13 Trustee, Thomas Hooper, 55 E. Monroe St., Suite 3850, Chicago, IL 60603,
via Electronic Court Notification;

City of Chicago, Utility Billing & Customer Service, 121 N. LaSalle St., Suite 400,
Chicago, IL 60602, via U.S. Mail;

Prestige Financial Svc, Attn: Bankruptcy , 351 W Opportunity Way, Draper, UT 84020,
via U.S. Mail;

Dennis Tucker, 5506 S. Morgan St., 2nd, Chicago, IL 60621, via U.S. Mail; and

See Attached List.

PLEASE TAKE NOTICE that on **June 26, 2023 at 9:00 a.m.**, I will appear before the
Honorable Judge Jacqueline Cox, or any judge sitting in her place, **either in Courtroom 680 of**
the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago,
IL 60604, or electronically as described below, and present the motion of the Debtor, to Extend
the Automatic Stay, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 273 2896** and the passcode is **778135**. The meeting ID and passcode can also be found on Judge Cox's webpage on the court's website, <https://www.ilnb.uscourts.gov/content/judge-jacqueline-p-cox>.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he sent the attached motion on **June 14, 2023**, to the above-named parties and the attached service list via U.S. Mail with postage prepaid from the mail located at 55 W. Monroe Street, Chicago, IL 60603.

/s/ Brian P. Deshur
Attorney for Debtor
The Law Office of David Freydin, Ltd.
8707 S. Skokie Blvd., Suite 312
Skokie, IL 60077
(312) 380-1564

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ase 23-07565
Northern District of Illinois
Eastern Division
ed Jun 14 19:43:22 CDT 2023

shley Funding Services
esurgent Capital Services
O Box 10587
Greenville, SC 29603-0587

(p)CHICAGO DEPARTMENT OF LAW
ATTN BANKRUPTCY UNIT
121 N LASALLE ST SUITE 400
CHICAGO IL 60602-1264

Arnold Scott Harris PC
111 W. Jackson Blvd, Ste 600
Chicago, IL 60604-3517

Comed
Bankruptcy Department
1919 Swift Drive
Oak Brook, IL 60523-1502

RS
entralized Insolvency Operation
.O. Box 7346
hiladelphia, PA 19101-7346

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

Linebarger Goggan Blair and Sampson
233 South Wacker Drive
Suite 4030
Chicago, IL 60606-6379

(p)PEOPLES GAS LIGHT & COKE COMPANY
00 EAST RANDOLPH ST
HICAGO IL 60601-6433

Prestige Financial Svc
Attn: Bankruptcy
351 W Opportunity Way
Draper, UT 84020-1401

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Dennis Tucker
5506 S. Morgan St.
2nd
Chicago, IL 60621-1515

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

homas H. Hooper
ffice of the Chapter 13 Trustee
5 E. Monroe St.
uite 3850
hicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

ity of Chicago
21 N. LaSalle St.
oom 107
hicago, IL 60602

(d)City of Chicago
Utility Billing & Customer Service
121 N. LaSalle St., Suite 400
Chicago, IL 60602

(d)City of Chicago Dept. of Administrative
Chicago Dept. of Law Bankruptcy
121 N. LaSalle St., Suite 400
Chicago, IL 60602

Jefferson Capital Systems
O Box 7999
aint Cloud, MN 56302

People's Gas
200 E Randolph
Chicago, IL 60601

End of Label Matrix	
Mailable recipients	15
Bypassed recipients	0
Total	15

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
Dennis Tucker,) Case No. 23 B 07565
Debtor) Honorable Cox
) Chapter 13
)

MOTION TO EXTEND AUTOMATIC STAY

NOW COMES Dennis Tucker, Debtor, by and through his attorney, The Law Office of David Freydin, Ltd., and moves this Honorable Court to extend the automatic stay, and in support thereof states as follows:

1. That Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C. on 6/9/23.
2. That this case has not yet been confirmed by this Honorable Court.
3. That Debtor is requesting this Honorable Court to extend the automatic stay pursuant to section 362 (c)(3)(A).
4. That Debtor has not converted the instant Chapter 13 case to a Chapter 7 case.
5. That Debtor has been in one prior case in the last twelve months, Case 20 B 19710, which was filed on 11/3/20 and dismissed on 4/17/23 for Failure to Make Plan Payments.
6. That in Debtor's prior case, he was carrying substantial cure to his prior counsel's office when his car was caught in a gun battle between two other vehicles.

7. That during the course of events, Debtor's car was grazed with a bullet, he ducked for cover, and subsequently lost the envelope containing the cash.
8. That, furthermore, Debtor was unable to borrow funds, despite several continuances.
9. That Debtor's prior counsel never discussed the possibility of a plan modification to defer the default.
10. That, accordingly, Debtor's case was dismissed
11. That, in this case, Debtor continues to receive pension and SSI.
12. That, in this case, Debtor qualifies for a commensurate Chapter 13 Plan payment because he paid over \$10,000 into his previous case.
13. That, in this case, Debtor has retained new counsel, who has thoroughly explained his plan, petition, schedules, and payment requirements to him.
14. That Debtor is in a position to pay his Chapter 13 Plan payment along with his regular expenses.
15. That Debtor's counsel has already created an epay login for Debtor and scheduled his first payment for him; Debtor's counsel will continue to login for Debtor to ensure continuity of payments.
16. That Debtor is in a position to proceed and has filed this case in good faith.

17. That, equitably, the stay should be Extended.

WHEREFORE, Dennis Tucker, the Debtor, prays this Honorable Court for the following relief:

- A. That this Honorable Court extend the automatic stay as for the reasons as set forth above; and
- B. For such other and further relief this Court deems just and proper.

Respectfully Submitted,

/s/ Brian P. Deshur
Attorney for Debtor
The Law Office of David Freydin, Ltd.
8707 S. Skokie Blvd., Suite 312
Skokie, IL 60077
(312) 380-1564